

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

AGIS SOFTWARE DEVELOPMENT LLC

Plaintiff,

v.

GOOGLE LLC

Defendant.

CIVIL ACTION NO. 2:19-cv-00361-JRG

Filed Under Seal

DECLARATION OF TYLER KRAUSE

I, Tyler Krause, hereby declare as follows:

1. I am a Program Manager for Google Shopping eCommerce Operations at Google LLC ("Google"). I work at Google's offices in Seattle, Washington. I have been a Google employee since May 2018.

2. I provide this declaration in support of Google's motion to dismiss for improper venue. I submit this declaration based on my personal knowledge and review of relevant company records.


3. I understand the Eastern District of Texas is defined as consisting of the counties identified on the Court's website (<http://www.txed.uscourts.gov/court-locator>).

4. As previously described on Google's website, Google Express was an online marketplace that connects shoppers with popular stores. Users of the Google Express service shopped online from an array of stores, like Costco and Target, for goods that were delivered to the user. In September 2019, Google Express was integrated with its Google Shopping service.

5. During 2019, Google did not employ any drivers, delivery people, or management

personnel, and did not own any factories, warehouses, storage facilities or delivery fleets in the Eastern District to facilitate its Google Express and Google Shopping services.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on February 11, 2020, in Seattle, Washington.



Tyler Krause